

HONORABLE MARSHA J. PECHMAN

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE WASHINGTON MUTUAL
MORTGAGE BACKED SECURITIES
LITIGATION

This Document Relates to: ALL CASES

Master Case No. 2:09-cv-00037-MJP

**DECLARATION OF KENNETH M.
REHNS IN RESPONSE TO
DEFENDANTS' MOTION TO SEAL
EXHIBITS TO THE SUPPLEMENTAL
YOU DECLARATION**

**NOTED ON MOTION CALENDAR:
August 26, 2011**

I, Kenneth M. Rehns, an attorney duly admitted to practice law before the courts of the State of New York and admitted *pro hac vice* to this Court, declare, under the penalty of perjury, as follows:

1. I am an Associate with the law firm of Cohen Milstein Sellers & Toll PLLC, co-lead counsel and attorneys for Boilermakers National Annuity Trust ("Boilermaker Trust" or "Plaintiff"). I am fully familiar with the facts and circumstances herein. I submit this Declaration in response to Defendants' motion to seal exhibits to the Supplemental Declaration of Jee Young You ("You Declaration") (Dkt. No. 304).

2. Exhibits A and B to the You Declaration are excerpts from reports from Plaintiff's investment consultant, Callan & Associates (Exhibit A), and Plaintiff's investment manager, Morgan & Company (Exhibit B).

1 3. These exhibits include information concerning several of Plaintiff's other
2 securities investments that constitute non-public, sensitive, confidential business information.
3 Other than the information regarding Plaintiff's holdings of the WaMu Certificates that are
4 the subject of this litigation, this information is not relevant to the present action.

5 4. Attached as Exhibits A and B to this Declaration are redacted versions of
6 Exhibits A and B to the You Declaration, which redact the non-public, sensitive and
7 confidential business information relating to Plaintiff's other securities holdings.

8 5. The non-redacted Exhibits A and B to the You Declaration should be filed
9 under seal and kept confidential, and the redacted versions made available for public access.
10 Plaintiff has no objection to the public filing of Exhibit C to the You Declaration.

11
12 Dated: August 22, 2011

COHEN MILSTEIN SELLERS & TOLL PLLC

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14 By: /s/ Kenneth M. Rehns

Kenneth M. Rehns (*admitted pro hac vice*)
88 Pine Street
Fourteenth Floor
New York, NY 10005
t: 212.838.7797
f: 212.838.7745

CERTIFICATE OF SERVICE

I hereby certify that on August 22, 2011, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to all counsel of record and additional persons listed below:

2:09-cv-00037-MJP Notice has been electronically mailed to:

Adam Zurofsky azurofsky@cahill.com

Arthur L Shingler ashingler@scott-scott.com, efile@scott-scott.com

Barry Robert Ostrager bostrager@stblaw.com, managingclerk@stblaw.com

Bradley T. Meissner bradley.meissner@dlapiper.com

Brian C Free bcf@hcmp.com, gcp@hcmp.com

Brian O. O'Mara bomara@csgrr.com

Bruce Earl Larson blarson@karrtuttle.com, psteinfeld@karrtuttle.com

Christopher E Lometti clometti@cohenmilstein.com

Corey E Delaney corey.delaney@dlapiper.com, kerry.cunningham@dlapiper.com,
patrick.smith@dlapiper.com, richard.hans@dlapiper.com

Daniel B Rehns drehns@cohenmilstein.com, efilings@cohenmilstein.com

Darren J Robbins e_file_sd@csgrr.com

David Daniel Hoff dhoff@tousley.com, efile@tousley.com

David M Balabanian david.balabanian@bingham.com

Dennis H Walters dwalters@karrtuttle.com, wbarker@karrtuttle.com

Douglas C McDermott doug@mcdermottnewman.com, eric@mcdermottnewman.com

Floyd Abrams fabrams@cahill.com

Frank Busch frank.busch@bingham.com, frank.downing@bingham.com

Gavin Williams Skok gskok@riddellwilliams.com, lmoore@riddellwilliams.com

1 Geoffrey M Johnson gjohnson@scott-scott.com, efile@scott-scott.com

2 Hal D Cunningham hcunningham@scott-scott.com, efile@scott-scott.com,
3 halcunningham@gmail.com

4 Hollis Lee Salzman (Terminated) hsalzman@labaton.com,
5 ElectronicCaseFiling@labaton.com

6 James J. Coster jcoster@ssbb.com, jregan@ssbb.com, managingclerk@ssbb.com

7 Janissa Ann Strabuk jstrabuk@tousley.com, wcruz@tousley.com

8 Jee Young You jeeyoung.you@bingham.com

9 Joel P Laitman jlaitman@cohenmilstein.com

10 John D Lowery jlowery@riddellwilliams.com, dhammonds@riddellwilliams.com

11 John D Pernick john.pernick@bingham.com

12 Jonathan Gardner jgardner@labaton.com

13 Joseph P Guglielmo jguglielmo@scott-scott.com, efile@scott-scott.com

14 Joseph A. Fonti (Terminated) jfonti@labaton.com, ElectronicCaseFiling@labaton.com

15 Joshua M. Rubins jrubins@ssbb.com, jregan@ssbb.com, managingclerk@ssbb.com

16 Joshua S. Devore jdevore@cohenmilstein.com, efilings@cohenmilstein.com

17 Julie Goldsmith Reiser jreiser@cohenmilstein.com

18 Julie Hwang (Terminated) jhwang@labaton.com, ElectronicCaseFiling@labaton.com

19 Kenneth J Pfaehler kenneth.pfaehler@snrdenton.com, nicole.reeber@snrdenton.com

20 Kenneth M Rehns krehns@cohenmilstein.com

21 Kerry F Cunningham kerry.cunningham@dlapiper.com

22 Kevin P Chavous kchavous@sonnenschein.com

23 Kim D Stephens kstephens@tousley.com, cbonifaci@tousley.com, wcruz@tousley.com

24 Larry Steven Gangnes gangnesl@lanepowell.com, docketing-sea@lanepowell.com,
25 donnellyjoss@lanepowell.com, sebringl@lanepowell.com

1 Leslie D Davis ldavis@sonnenschein.com
2 Louis David Peterson ldp@hcmp.com, smp@hcmp.com
3 Mary Kay Vyskocil mvyskocil@stblaw.com
4 Matthew B. Kaplan mkaplan@cohenmilstein.com, efilings@cohenmilstein.com
5 Michael H. Barr mbarr@sonnenschein.com
6 Mike Liles , Jr mliles@karrtuttle.com
7 Nancy A Pacharzina (Terminated) npacharzina@tousley.com, mhottman@tousley.com
8 Paul Scarlato pscarlato@labaton.com, ElectronicCaseFiling@labaton.com
9 Paul Joseph Kundtz pkundtz@riddellwilliams.com, mbergquam@riddellwilliams.com,
10 mdownloads@riddellwilliams.com
11 Richard A Speirs rspeirs@cohenmilstein.com
12 Richard F Hans richard.hans@dlapiper.com, dorinda.castro@dlapiper.com
13 Robert D Stewart stewart@kiplinglawgroup.com
14 Rogelio Omar Riojas omar.riojas@dlapiper.com, karen.hansen@dlapiper.com,
15 nina.marie@dlapiper.com
16 S Douglas Bunch dbunch@cohenmilstein.com
17 Serena Richardson (Terminated) srichardson@labaton.com,
18 ElectronicCaseFiling@labaton.com
19 Stelman Keehnel stellman.keehnel@dlapiper.com, patsy.howson@dlapiper.com
20 Stephen M. Rummage steverummage@dwt.com, jeannecadley@dwt.com,
21 seadocket@dwt.com
22 Steve W. Berman steve@hbsslaw.com, heatherw@hbsslaw.com, robert@hbsslaw.com
23 Steven J Toll stoll@cohenmilstein.com, efilings@cohenmilstein.com
24 Steven P Caplow stevencaplow@dwt.com, jasonSchattenkerk@dwt.com,
25 patrickwatts@dwt.com, seadocket@dwt.com, sheilarowden@dwt.com
26 Steven W Fogg sfogg@corrchronin.com, hpowell@corrchronin.com,
27 reception@corrchronin.com

1 Susan L Hoffman susan.hoffman@bingham.com

2 Tammy Roy troy@cahill.com

3 Theo J. Robins theo.robins@bingham.com

4 Timothy Michael Moran moran@kiplinglawgroup.com, cannon@kiplinglawgroup.com

5 Walter Eugene Barton gbarton@karrtuttle.com, danderson@karrtuttle.com,
6 nrandall@karrtuttle.com

7 Walter W. Noss wnoss@scott-scott.com, efile@scott-scott.com

8 **2:09-cv-00037-MJP Notice will not be electronically mailed to:**

9 WaMu Officer Defendants Securities MDL

10
11 By: /s/ Janissa A. Strabuk
12 Kim D. Stephens, WSBA #11984
13 Janissa A. Strabuk, WSBA #21827
14 1700 Seventh Avenue, Suite 2200
15 Seattle, Washington 98101
16 Telephone: (206) 682-5600
17 Facsimile: (206) 682-2992
18 Email: kstephens@tousley.com
19 jstrabuk@tousley.com

20 *Liaison Counsel for Plaintiffs and the Proposed*
21 *Class*